## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

LAVONDRA STUBBS,

Plaintiff,

v. Case No. 1:13-03434-MHS

HOLIDAY HOSPITALITY FRANCHISING, LLC f/k/a HOLIDAY FRANCHISING INC., SIX CONTINENTAL HOTELS, INC., and IHG MANAGEMENT (MARYLAND) LLC,

Defendants.

### JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

COME NOW Plaintiff and Defendants, by and through their counsel and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, and hereby jointly stipulate to dismissal of the above-styled lawsuit with prejudice, with all rights of appeal waived. The parties have agreed to a resolution under which Plaintiff will receive full compensation for her alleged claims under the FLSA, along with consideration for attorneys' fees and costs. As a result of the resolution, Plaintiff has received all amounts she could have recovered in this lawsuit. The Parties stipulate that no party is the prevailing party, and no party will

seek any additional costs, attorneys' fees, or expenses.

Respectfully submitted this 3rd day of January, 2014.

#### s/ Viraj Parmar

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Counsel For Plaintiff

### s/ Brett C. Bartlett

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Counsel For Defendants

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Defendants.

## **CERTIFICATE OF SERVICE**

I certify that on this day I delivered the foregoing Stipulation to all parties of record through the electronic system of the Northern District of Georgia, Atlanta Division.

<u>s/ Viraj Parmar</u> Viraj Parmar, Esq.

# **CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1D, counsel hereby certify that the foregoing pleading has been prepared using Times New Roman 14 point font, as approved by Local Rule 5.1C.

<u>s/ Viraj Parmar</u> Viraj Parmar, Esq.